

**Changing Campus Culture:
A policy scan of campus sexual violence prevention and response procedures on Ohio's
campuses**

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Abstract

Estimates of the prevalence of campus sexual violence suggest that 1 in 5 females and 1 in 16 males will be sexually assaulted during college. However, only about 20 percent of campus sexual assaults are reported to authorities and only 27 percent of women who said they experienced sexual assault believed the assault met the legal definition of rape. In 2015, in response to high rates of sexual violence on Ohio's campuses and marked inconsistencies in response procedures, the Ohio Department of Higher Education (ODHE) released the "Changing Campus Culture" Report (the Report), which included recommendations for preventing and responding to sexual violence. Institutions could opt-in to participate in this initiative.

The purpose of this research is to determine the extent to which Ohio's colleges and universities complied with the recommendations outlined in the Report. A policy scan of 14 public institutions and 14 private institutions in Ohio was conducted, once in Spring 2016, before ODHE's compliance deadline, and again in Fall 2016, after the compliance deadline. Policies are a method for ensuring accountability at the institutional level, and serve as an institution's official strategy for addressing an issue on campus. In light of this, each institution's Title IX and Sexual Misconduct policies were analyzed to measure the extent to which they met the recommendations set forth in the Report.

The results show that while most institutions had policies that met the Report's recommendations that focused on response to sexual violence after it has occurred, only a small number of institutions included information in their policies about preventive and educational actions, such as the administration of a campus climate survey, comprehensive training programs, or a campus awareness campaign. Many policies contained negligent errors, were vague and lacked concrete information for action, or were not conveniently accessible.

Introduction

Sexual violence on college campuses has been the focus of many studies for more than two decades, but researchers still have an incomplete sense of the rates of sexual assault on campuses, with discrepancies between many studies' statistics and much work left to do to eradicate this crime. Despite federal and state laws governing institutional prevention and response efforts, sexual violence continues to pervade college campuses across the country.

A study commissioned by the United States Department of Justice in 1996 found that three percent of college women are victims of sexual assault in any given year (DeMatteo, Galloway, Arnold & Patel, 2015). However, a more recent study conducted by the National Institute of Justice found that 19 percent of undergraduate women have been the victims of attempted or completed sexual assault since entering college (DeMatteo et al., 2015). A study conducted by the U.S. Department of Justice's Bureau of Justice Statistics in January 2016 supported this number, finding that 1 in 5 undergraduate females will be sexually assaulted while in college (Krebs et al., 2016).

Despite campus sexual violence having been in the public eye for decades, only recently have studies begun to look at the victimization of men and LGBTQ students. A report prepared for the National Institute of Justice found that approximately 6.1 percent of men, or 1 in 16, are victims of completed or attempted sexual assault during college (United States, Department of Education, Office for Civil Rights, 2011). The median estimate of lifetime sexual assault for gay or bisexual men was 30 percent, while the median estimate of lifetime sexual assault for lesbian or bisexual women was 43 percent (Rothman, Exner and Baughman, 2011). Additionally, almost 50 percent of transgender people are sexually assaulted in their lifetime (Wooten & Mitchell, 2016). Because it appears that victimization rates for LGBTQ men and women are greater than

those for heterosexual men and women, the risk for LGBTQ individuals may be much higher (Rothman et al., 2011).

Reporting numbers do not mirror these prevalence estimates, though. According to the National Crime Victimization Survey, collected from 2005-2013, only an estimated 20 percent of campus sexual assaults are reported to authorities, compared with 32 percent of assaults reported among nonstudent victims. A much higher percentage of sexual assaults, about 70 percent, are disclosed to friends, family members, roommates, or others close to the victim (DeMatteo et al., 2015).

A portion of the assaults that remain unreported have been attributed to possible uncertainty whether the assault constituted a crime. Only a meager 27 percent of women who reported experiencing sexual assault believed that the assault met the legal criteria for rape (DeMatteo et al., 2015). This phenomenon has been attributed to the rarity with which rape is committed with weapons, alcohol and/or physical injury, all of which are stereotypically attributed to occur in sexual assaults (Fisher & Sloan, 2007).

A U.S. Department of Justice National Institute of Justice research report from 2000 revealed additional reasons that victims may not have reported their victimization to authorities. Victims indicated that they did not view the incident as harmful enough to report, they did not want friends or family to know about their victimization, or they did not have proof that the assault occurred. Victims also feared the response police may have to their report or they anticipated the authorities would not believe the severity of their victimization or would not want to be bothered with their report (Fisher, Cullen & Turner, 2000).

Contrary to the belief held by many incoming college students, date or acquaintance rape accounts for 80-90 percent of sexual assaults, while stranger rape occurs only 10-20 percent of

the time. Data suggests that 31 percent of rapes are perpetrated by steady dating partners (Yeater & O'Donohue, 1999). In one study, 12.8 percent of completed rapes, 35 percent of attempted rapes, and 22.9 percent of threatened rapes took place on a date (Cantalupo, 2010).

In the face of such a complicated, often invisible crime, campus sexual misconduct policies are indispensable in the fight against sexual violence. Policies are developed to respond to problems affecting a community, shape the issue, and serve as a strategy for an institution's role and planned actions to address a concern. Policies represent a university's interests or priorities in a certain matter and are a vessel for ensuring accountability, promoting awareness, and increasing transparency among students, staff and faculty. Because policies are frequently up for negotiation and re-negotiation, policy analyses are imperative in bringing attention to hidden assumptions or policy silences and the unintended consequences of policy practices (Wooten & Mitchell, 2016).

For more than two decades, institutional response to sexual violence has been overseen by the federal government. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1990 requires institutions to disclose information about campus crime, while other laws like the Campus Sexual Assault Victims' Bill of Rights of 1992 and the Violence Against Women Act of 1994 preserve the rights of victims and perpetrators, and expanded the definition of sexual assault crimes, respectively.

The Ohio Department of Higher Education's 2015 "Changing Campus Culture" Report (the Report) expanded upon these federal policies and asked institutions in Ohio to implement more robust prevention, education and response programs and policies to protect students and work to end campus sexual violence.

This paper will address the following research question: To what extent have Ohio

colleges and universities complied with the recommendations set forth in the Ohio Department of Higher Education's "Changing Campus Culture" Report, as codified in university policy? To measure these potential policy improvements, a policy scan was conducted analyzing sexual violence prevention and response policies from Ohio's 14 public universities and 14 of Ohio's private universities. First, this paper will address federal and state policy regarding sexual violence on college campuses. This paper will then review the literature that supports the recommendations laid out in the "Changing Campus Culture" Report. The results of the scan will be reviewed and the implications of the results on institutional sexual misconduct policies will be discussed.

Literature Review

Federal Statutes Governing Sexual Violence on College Campuses in the U.S.

One of the first and arguably most important federal actions to respond to sexual violence was the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1990 (Clery Act). Jeanne Clery, for whom the law is named, was a freshman at Lehigh University when she was murdered. The Clery family later found that there were serious lapses in the university's security protocols, most notably that there was nothing governing campus crime response and prevention (Wooten & Mitchell, 2016). In 1990, President George H.W. Bush signed the Student Right-to-Know and Campus Security Act of 1990, which was renamed in memory of Jeanne Clery in 1998 (Fisher & Sloan, 2007). The Clery Act requires colleges and universities receiving federal financial aid to collect, retain, and disclose information about crime on or near their campus in a timely manner, with universities subject to fines for noncompliance (Lang, 2015).

The Campus Sexual Assault Victims' Bill of Rights was passed in 1992 as part of the

Higher Education Amendments of 1992 and was enacted to ensure that victims and offenders are afforded the same rights throughout the reporting and disciplinary process (Wooten & Mitchell, 2016). More broadly, the law mandates institutions to create and communicate sexual violence response policies and procedures to students (Cantalupo, 2010).

The Violence Against Women Act amendments to the Clery Act were signed into law in March 2013 and are informally known as the Campus Sexual Violence Elimination Act (SaVE Act). The amendments altered the Clery Act definitions to include dating violence, domestic violence and stalking, in order to require colleges and universities to educate, respond to, and prevent multiple forms of sexual violence (Wooten & Mitchell, 2016).

In April 2011, the U.S. Department of Education's Office for Civil Rights (OCR) issued a "Dear Colleague Letter" highlighting the epidemic of sexual violence on college campuses. The Letter reminded institutions that sexual violence and sexual harassment are forms of sex-based discrimination that institutions must address under the Title IX Education Amendments of 1972, the statute that prohibits sex-based discrimination at educational institutions receiving federal funding (Koss, Wilgus & Williamsen, 2014). The Letter describes how institutions should respond once a report of sexual misconduct is received and further details OCR's expectations and enforcement obligations under Title IX. If institutions failed to align their practices with the Letter's requirements, they risked the loss of federal financial support, including student grants, student loans and research funding (Koss et al., 2014).

With the complex culture surrounding sexual assault on college campuses, it's unsurprising that previous studies have found many weaknesses in institutions' response to campus sexual violence. In 2014, Senator Claire McCaskill (D-MO) commissioned a study of 440 four-year colleges and universities and found that only 50 percent of the institutions

provided a hotline for victims, only 44 percent had an online reporting option, and only 8 percent offered a confidential reporting option. Furthermore, more than 20 percent failed to provide response training to faculty and staff, 30 percent failed to provide training for students, and 30 percent of the schools provided no training to those who adjudicate sexual assault reports. More than 20 percent gave the athletic department oversight of sexual assault cases involving student athletes, while more than 70 percent of schools did not have protocols regarding how law enforcement and the academic institution should collaborate in response to a report of campus sexual assault (DeMatteo, et al., 2015).

State of Ohio's Policy Environment

As of Autumn 2016, two institutions in Ohio have been found in violation of the Clery Act. In October 2004, Miami University was fined \$27,500 for a combination of underreporting various crimes, including sex offenses, and other violations related to sexual violence (Cantalupo, 2010; Miami University, 2005). At the Ohio State University, allegations arose that one male student sexually assaulted two female students within weeks of each other in February 2002. Later, in February 2004, the survivor of the second assault sued the university, alleging violations of Title IX. In September 2006, the university was granted a summary judgment in the university's favor, but on December 20, 2006, the Department of Education found the university in violation of Clery for underreporting, incomplete and untimely reporting, and failure to issue timely warnings of campus crime (Cantalupo, 2010).

In February 2014, a University of Akron graduate filed a federal complaint that the university coerced rape victims into dropping disciplinary charges against perpetrators and failed to accurately report assaults and provide victims with accommodations. The student, while reviewing the university's policy to file her federal complaint, also found that the university's

policies resembled, or even aligned exactly, with the policies at other schools in Ohio, and even presumed to offer resources that weren't available on Akron's campus (Baker, 2015). The student's assaulter was later sentenced to 180 days in prison, but served only three (Vaidyanathan, 2016).

On May 1, 2014, OCR released the names of 55 higher education institutions that are under investigation for possible violations of Title IX over their handling of sexual violence and harassment complaints. In Ohio, three institutions were placed under investigation: Denison University, the Ohio State University, and Wittenberg University (U.S. Department of Education, Office for Civil Rights, 2016).

At the state level, Ohio's most recent initiative to fight sexual violence was set in motion in 2013, when over 100 sexual assaults were reported on Ohio's public campuses – a number that the state acknowledged was likely much lower than the actual number of assaults due to the tendency to underreport this crime. After a number of national studies found inconsistencies in how different colleges and universities investigate and respond to campus sexual violence, the Ohio Department of Higher Education (ODHE) conducted a review of Ohio's institutions and reported similar findings ("Changing Campus Culture: Background," 2016).

Later, in 2015, ODHE was allocated \$2 million to develop best practices for preventing and responding to campus sexual assault. A working group composed of campus presidents, advocacy groups, and campus and community experts statewide was convened, and the group's findings were released in an October 2015 report entitled "Changing Campus Culture: Preventing & Responding to Campus Sexual Violence" ("Changing Campus Culture: Background," 2016). The Report was intended for and meant to aid all colleges and universities in Ohio – public, private, two-year and four-year institutions alike – in preventing and

responding to sexual violence on campus (Ohio Department of Higher Education, 2015).

ODHE released the Report with the goal that 100 percent of Ohio campuses would adopt 100 percent of the recommendations by the beginning of the 2016-2017 academic year, in August 2016 (“Changing Campus Culture: Background,” 2016). The Report was released, along with robust accompanying resources to aid colleges and universities in adopting these recommendations, including sample campus climate survey questions, timelines, checklists, top sheets, guides, and FAQs (“Changing Campus Culture: Background,” 2016).

The five recommendations outlined in the Report are as follows:

1. **Use data to guide action.** Specifically, campuses are asked to administer an annual campus climate survey to inform prevention and response strategies, and to track trends over time.
2. **Empower staff, faculty, campus law enforcement and students to prevent and respond to sexual violence through evidence-based training.** Using feedback from the campus climate survey and/or other data sources to help select the most appropriate program, campuses should implement a comprehensive training program for their institution. Programs focused on bystander intervention are particularly encouraged.
3. **Communicate a culture of shared respect and responsibility.** Campuses should utilize a widespread awareness and communication campaign in conjunction with trainings and other initiatives to help encourage a safer culture.
4. **Develop a comprehensive response policy.** Campuses are encouraged to engage a variety of stakeholders in developing and adopting a comprehensive policy to address sexual violence on campus. This comprehensive policy will be both survivor-centered and respect the rights of the accused.
5. **Adopt a survivor-centered response.** By developing a response centered on survivors’ needs, such as providing confidential advisors, campuses can strengthen student trust in campus systems and processes (Ohio Department of Higher Education, 2015, p.3).

The second recommendation from the Report asked institutions to utilize evidence-based training programs and awareness campaigns to educate students on campus – an important part of campus sexual violence prevention. Research has shown that the victim’s ability to define their victimization as sexual violence is dependent upon the reactions of those to whom he or she

first discloses the assault, and students who are sexually assaulted are most likely to tell their friends first (Fisher & Sloan, 2007). For this reason, it is beneficial for schools to train students and staff in what to do if someone discloses that he or she has been sexually assaulted and not to reserve response training solely for resident advisors, student security officers, or student employees.

Furthermore, a study by Anderson and Whiston (2005) showed that students who participated in a sexual violence education program showed greater factual knowledge about rape than those who did not attend a program. Such results are encouraging because, as previously mentioned, 27 percent of sexual assault victims do not identify the behavior that was inflicted upon them as a crime (DeMatteo et al., 2015).

Increasing awareness is a vital part of changing attitudes and behaviors, an outcome that was seen beginning in the 1960s when the dangers of cigarettes and tobacco were widely disseminated. The per capita number of cigarettes smoked per year declined beginning in 1964, with the Surgeon General's report on smoking and health, with the Fairness Doctrine in the late 1960s, and the broadcast ad ban in the early 1970s. Per capita number of cigarettes smoked further declined with the nonsmokers' rights movement and when the federal cigarette tax doubled. Whereas in 1960, Americans smoked 4,000 cigarettes per capita each year, in 2012, American adults smoked slightly more than 1,000 cigarettes per capita each year, a decline that can be attributed to five decades of awareness-raising public policies (The Health Consequences of Smoking: 50 Years of Progress, 2014). Applying these results to sexual violence, it is possible that raising awareness of sexual violence on college campuses could result in similar changes in attitudes and behaviors, and perhaps significantly contribute to the conclusion of this crime.

The third recommendation from the Report asked institutions to communicate a culture of

shared respect and responsibility, including offering bystander intervention training. Much national attention for sexual violence has been focused on bystander intervention, particularly after the launch of President Obama's *It's On Us* campaign in September 2014. However, a study conducted by Rutgers University researcher Sarah McMahon suggested that beliefs in rape myths are negatively related to students' intentions to intervene as bystanders. Given this information, it's important that education about rape myths accompany bystander intervention in order for the training to be effective (McMahon, 2010). Having said this, McMahon also notes that bystander intervention training has been supported by the Centers for Disease Control and Prevention's call for a shift in sexual violence prevention and training that would emphasize primary prevention and the responsibility of the community to help end sexual violence. Bystanders are often present before an assault occurs, and if trained correctly, could interrupt dangerous situations (McMahon, 2010).

In addition to offering training opportunities as a method of increasing awareness and encouraging reporting, researchers have found that other actions, such as offering services for victims of sexual violence, having written law enforcement response protocols, establishing coordination between the campus and the surrounding community, and including training at new student orientations are all actions seen by administrators to facilitate reporting (Karjane, Fisher & Cullen, 2005). Many of these methods are also found in ODHE's Report recommendations.

Further recommendations from research supported by the U.S. Department of Justice to alleviate barriers to reporting include offering confidential and anonymous reporting options, utilizing inclusive language for definitions of various forms of sexual violence in policies, and including contact information in policies for on-campus alternatives to police, such as victim advocates (Krivoshey et al., 2013). Furthermore, in 96 percent of sexual assaults, the offender is

an acquaintance, classmate, significant other, friend or other known relation to the victim.

Because more than 30 percent of victims cite that fear of retaliation was a reason they did not report their assault, emphasizing confidential reporting and support resources can overcome a major barrier to reporting (Krivoshey et al., 2013).

However, it's also important to be deliberate in the reporting and support resources offered to survivors. Even though many campuses offer several possible outlets for reporting, including campus security, campus police, city police, residential life staff, a dean of students, student health services, and student counseling center professionals, among others, few victims report to the police or to campus authorities whose role on campus is not primarily related to safety or security, such as academic deans (Krivoshey, Adkins, Hayes, Nemeth & Klein, 2013).

Data and Methodology

In order to analyze the levels of compliance among public and private colleges and universities in Ohio, two sets of policy scans were completed. The first scan, completed in April 2016, measured initial compliance of colleges and universities in Ohio before the compliance deadline of August 2016. The second scan, completed in September 2016, measured improvements and changes made after the compliance deadline set by the Report as the beginning of the 2016-2017 school year. Spring 2016 policies were obtained on February 1, 2016, and Fall 2016 policies were obtained on September 1, 2016.

As stated in the introduction, policies are a vessel for ensuring accountability at the institutional setting and serve as a strategy for an institution's plan to address an issue on its campus. In this study, a policy scan was conducted because this method could uniquely highlight areas in which institutional policy exceeds expectations or is lacking. A policy scan could also reveal oversights in institutional policies, and ultimately mirrors the results that stakeholders and

students would see if they sought out these policies. In this study, compliance with the “Changing Campus Culture” Report’s recommendations is defined as those actions that are codified in official university policies, which are accessible online for students, faculty, staff, stakeholders and the broader local community.

As stated on ODHE’s Report website, participation in the “Changing Campus Culture” initiative was not mandated by the state, but 100 percent of public schools opted to participate, with 81 percent of all public and private schools in Ohio opting in (“Changing Campus Culture: Benchmark Data”). There were no incentives to encourage participation, but participating institutions had access to advice, expertise, and financial aid to support their implementation efforts.

The data set includes Title IX, Sexual Misconduct and Student Code of Conduct policies from 14 public four-year schools and 14 private four-year schools. The policies considered from each school can be found in Tables 21 and 22 in Appendix B. The colleges and universities considered in this policy scan are listed in Table 1.

Table 1: Ohio colleges and universities analyzed for sexual violence policies and prevention efforts	
Public Institutions	Private Institutions
Bowling Green State University	Ashland University
Central State University	Baldwin Wallace University
University of Cincinnati	Capital University
Cleveland State University	Case Western Reserve University
Kent State University	Cedarville University
Miami University	Franklin University
Northeast Ohio Medical University	John Carroll University
The Ohio State University	Oberlin University
Ohio University	Ohio Northern University
Shawnee State University	Tiffin University
University of Toledo	University of Dayton
University of Akron	University of Findlay
Wright State University	University of Northwestern Ohio
Youngstown University	Xavier University

The public institutions chosen include all 14 four-year colleges listed on ODHE’s website (“Ohio Public Institutions”). Private schools with at least 2,500 enrolled students were chosen for this scan. Because eleven of the 14 public institutions considered in this research have at least 10,000 students enrolled, selecting the larger private institutions with at least 2,500 enrolled undergraduates allowed for a more applicable comparison between the two types of institutions. These private schools were selected to be scanned using the filtering resource available on the Ohio Private Colleges website to sort by the number of students enrolled (“Ohio Private Colleges”).

It is predicted that the Ohio Department of Higher Education strategies outlined in the “Changing Campus Culture” Report will result in substantial institutional policy improvements at the colleges and universities in Ohio that opted to participate in the “Changing Campus Culture” initiative. It is further predicted that public institutions will have higher rates of compliance than private institutions because public institutions have been required to comply with federal safety laws and regulations for a much longer period of time than have private institutions.

Policies for the colleges and universities scanned were obtained through Google using the key search terms “Title IX Policy,” “Sexual Misconduct Policy,” and “Sexual Assault,” among others listed in Table 23 in Appendix B. Information listed on school webpages was excluded from the analysis, with only official school policies being considered, except for webpages directly referenced and linked through institutional policy. For example, one public university included information on its Sexual and Relationship Violence Support Services website about its many training and awareness events, including Green Dot, Take Back the Night and the Clothesline Project. However, because this information was not included in the school’s policy

documents, it was not considered in this policy review. Information on webpages was only considered for institutions that, instead of including all relevant information directly in their policy, included a link to a webpage that hosted that information.

Out of the “Changing Campus Culture” Report, five recommendations and seven sub-objectives were identified, as shown in Table 2.

Table 2: Changing Campus Culture Report Codebook Recommendations
Changing Campus Culture Report Recommendations
Recommendation 1: Using data to guide action
1a. Annual climate survey
1b. Measure effectiveness of all programs
Recommendation 2: Evidence-based training empowering campus community
2a. Training program addresses multiple stakeholders
2b. Program uses feedback gained from climate survey
Recommendation 3: Culture of shared respect and responsibility
3a. Widespread, cohesive awareness campaign
Recommendation 4: Develop a comprehensive response protocol
4a. Comprehensive response protocol
Recommendation 5: Adopt a survivor-centered response
5a. Response strategies centered on survivors' needs

Although not included in the main five components of ODHE’s Report, some aspects of the Report were implied to be actions above and beyond the framework established in the Report’s recommendations, and are detailed here as supplemental policy recommendations, as listed in Table 3. These supplemental points of analysis are important additions included in ODHE’s report, all of which are considered here, that can contribute to the creation of a comprehensive sexual violence policy. Whereas the Report’s five main recommendations are meant to create uniform minimum standards across Ohio’s campuses, these supplemental policy points can help inform not only which colleges have already met those minimum standards, but which colleges have progressed above and beyond state or federal requirements to develop a

more holistic approach to sexual violence prevention and response.

Table 3: Supplemental Policy Analysis Codebook	
Supplemental Policy Analysis	
Recommendation 2: Evidence-based training empowering campus community	
	2a. List of training programs offered
	2c. Bystander training offered
	2d. Self-protection training offered
	2e. Trauma-informed training offered
Recommendation 3: Culture of shared respect and responsibility	
	3a. Campus campaign - It's On Us
	3a. Campus campaign - List others
Recommendation 4: Develop a comprehensive response protocol	
	4b. Ongoing outreach to students - List tactics
Recommendation 5: Adopt a survivor-centered response	
	5a. Confidential advisor
	5b. Victim advocate

Compliance with Report recommendations was scored as follows: for each individual recommendation, if the institution met all of the objectives in the Report, the school received a 2 for that recommendation. If the school met at least one, but not all, of the objectives of the recommendation, the school received a 1 for that recommendation. If the school did not meet any of the objectives of the recommendation, that school received a 0 for that recommendation.

The policies from each institution scanned received a score from 0-2 for each sub-objective listed in Table 2, as well as an overall score for each recommendation included in the Report. A school received an overall score of 2 if all of the sub-objectives received a score of 2. A school received an overall score of 1 for each recommendation in which at least one sub-objective received a score of at least 1. A school received an overall score of 0 for each recommendation in which no sub-objective received a score greater than 0.

Table 6: Spring 2016 - Private Institution Coding Results		Ashland University	Baldwin Wallace University	Capital University	Case Western Reserve University	Cedarville University	Franklin University	John Carroll University	Oberlin University	Ohio Northern University	Tiffin University	University of Dayton	University of Findlay	University of Northwestern Ohio	Xavier University	No. Schools Minimally Compliant	Percent Schools Minimally Compliant
Recommendation 1: Using data to guide action		0	0	0	0	0	0	0	1	0	0	0	0	0	0	1	7%
1a. Annual climate survey		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
1b. Measure effectiveness of all programs		0	0	0	0	0	0	0	2	0	0	0	0	0	0	1	7%
Recommendation 2: Evidence-based training		0	0	0	1	0	0	0	1	1	0	1	1	0	1	6	43%
2a. Training program addresses multiple stakeholders		0	0	0	2	0	0	0	2	2	0	2	2	0	2	6	43%
2b. Program uses feedback from climate survey		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
Recommendation 3: Culture of respect and responsibility		0	0	0	0	0	0	0	0	0	0	0	0	1	1	2	14%
Recommendation 4: Comprehensive response protocol		2	2	2	2	2	2	2	2	2	2	2	2	2	1	14	100%
Recommendation 5: Adopt a survivor-centered response		2	2	2	2	2	2	2	2	2	2	2	2	2	0	2	93%

Table 7: Fall 2016 - Private Institution Coding Results		Ashland University	Baldwin Wallace University	Capital University	Case Western Reserve University	Cedarville University	Franklin University	John Carroll University	Oberlin University	Ohio Northern University	Tiffin University	University of Dayton	University of Findlay	University of Northwestern Ohio	Xavier University	No. Schools Minimally Compliant	Percent Schools Minimally Compliant
Recommendation 1: Using data to guide action		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
1a. Annual climate survey		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
1b. Measure effectiveness of all programs		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
Recommendation 2: Evidence-based training		1	1	0	1	1	0	0	1	1	0	0	1	0	1	8	57%
2a. Training program addresses multiple stakeholders		1	2	0	2	1	0	0	2	2	0	2	2	0	2	9	64%
2b. Program uses feedback from climate survey		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
Recommendation 3: Culture of respect and responsibility		0	0	0	0	0	0	0	0	0	0	0	1	0	1	2	14%
Recommendation 4: Comprehensive response protocol		2	2	2	2	2	2	2	2	2	2	2	2	2	2	14	100%
Recommendation 5: Adopt a survivor-centered response		2	2	2	2	2	2	2	2	2	2	2	2	2	2	14	100%

Results

Tables 4-7 on pages 17 and 18 include the results of the policy scans conducted, separated by Spring and Fall results for public and private institutions. If institutions received a score of at least one for a certain recommendation or sub-objective, that institution is considered minimally compliant with the recommendation set forth in the Report.

Recommendation 1: Use Data to Guide Action

Recommendation one from the Report, using data to guide action, had two identified sub-objectives: the first was the administration of an annual climate survey and the second was the measurement of the effectiveness of all programs offered.

According to institutional policies, in Spring 2016, Ohio State University was the only school out of all 28 schools scanned (4%) that administered an annual climate survey. In Fall 2016, there was no mention of the administration of a campus climate survey in any policy documents for any schools scanned. These results, however, do not align with ODHE's posted list of institutions that reported completing a campus climate survey in the past year, a list that included 25 of the institutions considered here. The only three institutions considered here that did not report the completion of a campus climate survey to ODHE were Cedarville University, Franklin University, and Ohio Northern University ("Ohio Campuses Reporting Completion of a Campus Climate Survey in the past year.").

In Spring 2016, two schools (7%), Ohio State and Oberlin University, included statements in policy documents regarding the measurement of the effectiveness of all programs, but only one school (4%), Ohio State, included such information in Fall 2016.

Recommendation 2: Empower Campus to Respond Through Evidence-Based Training

The second recommendation from the Report asked schools to empower the campus

community to prevent and respond to sexual violence using evidence-based training. The two sub-objectives identified for this recommendation

were whether the training program addressed multiple stakeholders and whether the program used feedback gained from the climate survey.

In Spring 2016, 15 schools (54%) included information in their policies regarding a training program offered to the university community that received a score of at least 1. In Fall 2016, that number had increased to 18 schools (64%) that had included information about a training

program in their policies. In Spring 2016, only one school (4%), Ohio State, included information about the campus climate survey being used to design training programs, and by Fall 2016, that number had decreased to zero schools. Table 8 lists the training programs included in institutional policies at Ohio colleges and universities.

Table 8: Training Programs Offered at Ohio Colleges and Universities
Campus Clarity: Think About It
Law Room
Safe Space Ally Development
AlcoholEdu
Haven: Understanding Sexual Assault
Better Bystanders
Rape Aggression Defense Training (RAD)
CHOICES: For Greek Life
Sex Signals
BeeWise Peer Educator Training
Green Dot Training
Not Anymore: Bystander Intervention
Step Up! Bystander Intervention

Recommendation 3: Communicate a Culture of Shared Respect and Responsibility

The Report's third recommendation asked institutions to utilize campus awareness campaigns to communicate a culture of shared respect and responsibility. In Spring 2016, five schools (18%), Miami University, Ohio State, Ohio University, the University of Findlay, and Xavier University, had some kind of campus-wide campaign that was cited in policy and earned a score of at least 1, including the *It's On Us* campaign, Not Anonymous, No More and I Am Miami, among others. By Fall 2016, only four schools (14%), Miami University, Ohio State, Findlay, and Xavier, included a campus awareness campaign in institutional policy. Table 9 lists

the awareness programs and events that were found in Ohio college policy documents.

Recommendation 4: Develop a Comprehensive Response Policy

Recommendation four asked institutions to develop a comprehensive response protocol that is both survivor-centered and preserves the rights of the accused. In both Spring 2016 and Fall 2016, all 28 institutional policies scanned (100%) documented the use of a response protocol that met the Report's qualifications.

Table 9: Awareness Programs and Events Offered at Ohio Colleges and Universities
Sexual Assault Awareness Month
The Clothesline Project
Take Back the Night
Walk a Mile in Her Shoes
Denim Day
One Billion Rising
RAINN Day
The Vagina Monologues

Recommendation 5: Adopt a Survivor-Centered Response

As the final recommendation of the Report, recommendation five asked institutions to adopt a survivor-centered response to sexual violence, such as providing confidential advisors, victim advocates, or including a sexual assault response guarantee in their policy.

In Spring 2016, 26 of the institutional policies scanned (93%), all except for Shawnee State University and the University of Northwestern Ohio, documented the university's provision of some kind of survivor-centered response that received a score of at least 1, such as providing confidential advisors, victim advocates, or detailing extensive interim measures that can be taken to protect survivors, among other possible responses. In Fall 2016, 27 schools (96%), all except Shawnee State, offered some kind of survivor-centered response documented in policy.

Supplemental Policy Analysis

Tables 10-13 on pages 22 and 23 include the results of the supplemental policy scans conducted, separated by Spring and Fall results for public and private institutions. If institutions received a score of at least one for a certain recommendation or sub-objective, that institution is considered minimally compliant with the recommendation set forth in the Report.

Table 10: Spring 2016 – Public Institution Supplemental Coding Results		Bowling Green State University	Central State University	University of Cincinnati	Cleveland State University	Kent State University	Miami University	Northeast Ohio Medical University	Ohio State University	Ohio University	Shawnee State University	University of Toledo	University of Akron	Wright State University	Youngstown University	No. Schools Minimally Compliant	Percent Schools Minimally Compliant
2c. Bystander training offered	0	0	0	1	0	0	2	0	1	2	0	0	0	0	0	4	29%
2d. Self-protection training offered	0	0	0	2	0	0	2	0	2	2	0	0	0	0	0	4	29%
2e. Trauma-informed training offered	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0	1	7%
3a. Campus campaign - It's On Us	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	1	7%
5a. Confidential advisor	2	0	2	2	2	0	2	2	0	2	0	2	0	0	2	8	57%
5b. Victim advocate	1	0	2	0	0	0	2	2	2	2	0	2	0	0	0	7	50%
5c. Sexual Assault Response Guarantee	0	0	0	0	0	0	2	0	2	0	0	0	0	0	0	2	14%

Table 11: Fall 2016 – Public Institution Supplemental Coding Results		Bowling Green State University	Central State University	University of Cincinnati	Cleveland State University	Kent State University	Miami University	Northeast Ohio Medical University	Ohio State University	Ohio University	Shawnee State University	University of Toledo	University of Akron	Wright State University	Youngstown University	No. Schools Minimally Compliant	Percent Schools Minimally Compliant
2c. Bystander training offered	0	0	0	1	0	0	2	0	1	2	0	0	0	0	0	4	29%
2d. Self-protection training offered	0	0	2	0	0	0	2	0	2	2	0	0	0	0	0	4	29%
2e. Trauma-informed training offered	0	0	0	0	0	0	2	0	2	0	0	0	0	0	0	2	14%
3a. Campus campaign - It's On Us	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	1	7%
5a. Confidential advisor	2	2	2	2	2	2	2	2	2	2	0	2	2	2	0	12	86%
5b. Victim advocate	1	0	2	0	0	0	2	2	2	2	0	2	0	2	0	8	57%
5c. Sexual Assault Response Guarantee	0	0	0	0	0	0	2	0	2	0	0	0	0	0	0	2	14%

Table 12: Spring 2016 – Private Institution Supplemental Coding Results		Ashland University	Baldwin Wallace University	Capital University	Case Western Reserve University	Cedarville University	Franklin University	John Carroll University	Oberlin University	Ohio Northern University	Tiffin University	University of Dayton	University of Findlay	University of Northwestern Ohio	Xavier University	No. Schools Minimally Compliant	Percent Schools Minimally Compliant
2c. Bystander training offered	1	2	0	0	0	0	0	0	1	0	0	2	1	0	0	5	36%
2d. Self-protection training offered	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
2e. Trauma-informed training offered	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
3a. Campus campaign - It's On Us	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
5a. Confidential advisor	2	2	2	2	2	2	2	2	2	2	0	2	2	0	2	12	86%
5b. Victim advocate	1	0	0	0	0	0	0	2	2	0	2	0	2	0	2	6	43%
5c. Sexual Assault Response Guarantee	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%

Table 13: Fall 2016 – Private Institution Supplemental Coding Results		Ashland University	Baldwin Wallace University	Capital University	Case Western Reserve University	Cedarville University	Franklin University	John Carroll University	Oberlin University	Ohio Northern University	Tiffin University	University of Dayton	University of Findlay	University of Northwestern Ohio	Xavier University	No. Schools Minimally Compliant	Percent Schools Minimally Compliant
2c. Bystander training offered	1	2	0	0	0	0	0	0	1	0	0	2	1	0	1	6	43%
2d. Self-protection training offered	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
2e. Trauma-informed training offered	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	1	7%
3a. Campus campaign - It's On Us	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%
5a. Confidential advisor	2	2	2	2	2	2	1	2	2	2	2	2	2	2	2	14	100%
5b. Victim advocate	2	0	0	2	0	0	0	2	0	0	2	0	2	2	2	7	50%
5c. Sexual Assault Response Guarantee	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%

As mentioned in institutional policy, in Spring 2016, nine schools (32%) offered bystander intervention training on campus, and another nine schools (32%) also provided self-protection training, such as risk factor training and self-defense training. In Fall 2016, that number increased to 10 institutions (36%) implementing each bystander intervention training and self-protection training.

Trauma-informed training prepares campus responders such as investigators, police, and Title IX coordinators to recognize and understand the guilt and memory fragmentation obstacles often experienced by survivors of traumatic crimes such as sexual violence. According to institutional policies, in Spring 2016, only one school (4%), Ohio State, provided trauma-informed training for first responders, with that number increasing to three schools offering such training (11%), Ohio State, Miami University, and Ohio Northern University, in Fall 2016.

In both Spring 2016 and Fall 2016, Miami University was the only school (4%) that offered the *It's On Us* campaign on campus, according to institutional policies.

Confidential advisors, as detailed in the Report, are trained professionals who can support survivors and safeguard them from engagement in subsequent investigative processes. Confidential advisors commonly hold mental health practitioner certifications, and throughout the course of this scan, were overwhelmingly housed with the institution's student counseling services. In Spring 2016, twenty schools (71%) included information in their policies about a confidential advisor for survivors of sexual violence, a number that increased to twenty-six institutions (93%), all except Shawnee State and Youngstown University, offering such services in Fall 2016.

Similar trends were seen with the institutions that provided a victim advocate. Victim advocates work one-on-one with survivors to offer information, emotional support, 24/7

response at the hospital during evidence collection, assistance with interim measures, help finding resources, and aid in the filing of victims' compensation, among many other critical services. In Spring 2016, according to school policy, thirteen schools (46%) provided a victim advocate, while fifteen schools (54%) provided an advocate in Fall 2016.

In both Spring 2016 and Fall 2016, there were two institutions (7%), Ohio State and Miami, that included a sexual assault response guarantee in their response protocol. Such a guarantee serves to explain in survivor-friendly terms what can be expected in the reporting process and aims to alleviate possible concerns a survivor may have, such as when they will meet with the police and how their identity might be protected.

Tables 15-16 on page 26 include the rates of compliance for public and private institutions for the five Report recommendations and for the supplemental policy analysis points. Tables 17-18 on page 27 include compliance rates for all institutions in the Spring and Fall, for the five Report recommendations and for the supplemental analysis points. The right-hand column shows the percent of change between Spring and Fall, in order to show the rates of improvement, or lack thereof, for each recommendation and analysis point.

Overall, as shown in Table 14, only 46 percent of institutions issued a revised policy from Spring 2016 to Fall 2016. Although ODHE's stated compliance goal was 100

Table 14: Institutional Policy Change from Spring 2016 to Fall 2016	Institutions with at least One Policy Changed from Spring 2016 to Fall 2016 n (%)
Public (n=14)	5 (36%)
Private (n=14)	8 (57%)
All Institutions (n=28)	13 (46%)

percent compliance by August 2016, the "Changing Campus Culture" Report did not specify that ODHE required that institutional policy be changed to show compliance. While ODHE may consider the overall compliance of all of a school's actions, this study was designed to determine

Table 15: Minimum Compliance Results by Recommendation for Public and Private Institutions	Public (n=14)				Private (n=14)			
	Compliance with ODHE recommendations as reflected in campus policy		Percent Change ((Spring n – Fall n)/Spring n) * 100		Compliance with ODHE recommendations as reflected in campus policy		Percent Change ((Spring n – Fall n)/Spring n) * 100	
	Spring n (%)	Fall n (%)			Spring n (%)	Fall n (%)		
Recommendation 1: Using data to guide action	1 (7%)	1 (7%)	0%		1 (7%)	0 (0%)	-100%	
1a. Annual climate survey	1 (7%)	0 (0%)	-100%		0 (0%)	0 (0%)	0%	
1b. Measure effectiveness of all programs	1 (7%)	1 (7%)	0%		1 (7%)	0 (0%)	-100%	
Recommendation 2: Evidence-based training	10 (71%)	9 (64%)	-10%		6 (43%)	8 (57%)	33%	
2a. Training program addresses multiple stakeholders	9 (64%)	9 (64%)	0%		6 (43%)	9 (64%)	49%	
2b. Program uses feedback from climate survey	1 (7%)	0 (0%)	-100%		0 (0%)	0 (0%)	0%	
Recommendation 3: Culture of respect and responsibility	3 (21%)	2 (14%)	-33%		2 (14%)	2 (14%)	0%	
Recommendation 4: Comprehensive response protocol	14 (100%)	14 (100%)	0%		14 (100%)	14 (100%)	0%	
Recommendation 5: Adopt a survivor-centered response	13 (93%)	13 (93%)	0%		13 (93%)	14 (100%)	8%	

Table 16: Minimum Compliance Results by Supplemental Recommendation for Public and Private Institutions	Public (n=14)				Private (n=14)			
	Compliance with ODHE recommendations as reflected in campus policy		Percent Change ((Spring n – Fall n)/Spring n) *	Percent Change ((Spring n – Fall n)/Spring n) *	Compliance with ODHE recommendations as reflected in campus policy		Percent Change ((Spring n – Fall n)/Spring n) *	
	Spring n (%)	Fall n (%)			Spring n (%)	Fall n (%)		
Supplemental Policy Analysis								
2c. Bystander training offered	4 (29%)	4 (29%)	0%		5 (36%)	6 (43%)	19%	
2d. Self-protection training offered	4 (29%)	4 (29%)	0%		0 (0%)	0 (0%)	0%	
2e. Trauma-informed training offered	1 (7%)	2 (14%)	100%		0 (0%)	1 (7%)	N/A	
3a. Campus campaign - It's On Us	1 (7%)	1 (7%)	0%		0 (0%)	0 (0%)	0%	
5a. Confidential advisor	8 (57%)	12 (86%)	51%		12 (86%)	14 (100%)	16%	
5b. Victim advocate	7 (50%)	8 (57%)	14%		6 (43%)	7 (50%)	16%	
5c. Sexual Assault Response Guarantee	2 (14%)	2 (14%)	0%		0 (0%)	0 (0%)	0%	

Table 17: Minimum Compliance Results by Recommendation for All Institutions	All Institutions (n=28)		
	Compliance with ODHE recommendations as reflected in campus policy		Percent Change ((Spring n – Fall n)/Spring n) * 100
	Spring n (%)	Fall n (%)	
Recommendation 1: Using data to guide action	2 (7%)	1 (4%)	-43%
1a. Annual climate survey	1 (4%)	0 (0%)	-100%
1b. Measure effectiveness of all programs	2 (7%)	1 (4%)	-43%
Recommendation 2: Evidence-based training	16 (57%)	17 (61%)	7%
2a. Training program addresses multiple stakeholders	15 (54%)	18 (64%)	19%
2b. Program uses feedback from climate survey	1 (4%)	0 (0%)	-100%
Recommendation 3: Culture of respect and responsibility	5 (18%)	4 (14%)	-22%
Recommendation 4: Comprehensive response protocol	28 (100%)	28 (100%)	0%
Recommendation 5: Adopt a survivor-centered response	26 (93%)	27 (96%)	3%

Table 18: Minimum Compliance Results by Supplemental Recommendation for All Institutions	All Institutions (n=28)		
	Compliance with ODHE recommendations as reflected in campus policy		Percent Change ((Spring n – Fall n)/Spring n) * 100
	Spring n (%)	Fall n (%)	
Supplemental Policy Analysis			
2c. Bystander training offered	9 (32%)	10 (36%)	13%
2d. Self-protection training offered	9 (32%)	10 (36%)	13%
2e. Trauma-informed training offered	1 (4%)	3 (11%)	175%
3a. Campus campaign - It's On Us	1 (4%)	1 (4%)	0%
5a. Confidential advisor	20 (71%)	26 (93%)	31%
5b. Victim advocate	13 (46%)	15 (54%)	17%
5c. Sexual Assault Response Guarantee	2 (7%)	2 (7%)	0%

if the recommendations included in the Report are explicitly documented in school policies across Ohio.

Discussion and Recommendations

Out of all recommendations measured in this scan, the provision of a confidential advisor for survivors experienced the greatest growth from Spring 2016 to Fall 2016, with six additional schools including information in institutional policy about offering such a resource to survivors in the Fall. According to institutional policies, two additional schools (7%) offered a victim advocate, two additional schools (7%) offered trauma-informed training, one additional school (4%) offered bystander training, and one additional school (4%) offered self-protection training between Spring 2016 and Fall 2016.

Compared with all other recommendations, the number of schools complying with recommendation four, developing a comprehensive response policy, and recommendation five, adopting a survivor-centered response, was surprisingly high, with the policy content corresponding with these recommendations being especially robust. Both of these recommendations had almost 100 percent compliance, an impressive rate when compared to the rates of compliance for other recommendations that focus more on prevention and education than on post-assault support and response. It is possible that this circumstance exists because institutions have had much more time to comply with laws and regulations governing these aspects of sexual assault response – about 25 more years.

There is a loose association between the size of the institution and the level of compliance with the recommendations listed in the Report. Ohio State, Miami, University of Cincinnati, University of Toledo, and Ohio University, five of the biggest universities in the state by enrollment, received some of the highest compliance scores out of all schools scanned.

Smaller institutions tended to receive much lower scores, to have fewer innovative policies or programs, and tended to only address sexual assault in one or two paragraphs in the Code of Conduct or the Student Handbook, rather than dedicating an entire policy to the issue. Larger schools likely have more resources, greater sources of funding, more staff that can dedicate their time to preventing sexual violence, and likely have more political capital, and experience more political pressure, than do smaller institutions in Ohio.

A joint Washington Post–Kaiser Family Foundation poll surveying students from more than 500 universities indicated that campus attributes such as public or private status, religious affiliation, or size do not impact the prevalence of campus sexual assault (Anderson & Clement, 2015). However, the results of the present analysis could indicate that these attributes may impact institutional response to campus sexual assault.

Strikingly, there were several areas where institutional policy regressed from Spring 2016 to Fall 2016. According to the school policies considered, in comparison to the Spring policy scan, by Fall 2016, one fewer school (4%), Ohio State, implemented a campus climate survey, one fewer school (4%), Oberlin, measured the effectiveness of all programs offered, one fewer school (4%), Ohio State, used the climate survey results in the development of training programs, and one fewer school (4%), Ohio University, utilized a campus-wide awareness campaign. This phenomenon could be attributed to a host of causes. Many institutions worked to improve their policies, and in the process changed the titles, organization, and content of these policies. For some schools, new policies were created, and for others, policies were consolidated or superseded by other, newer policies. This could have created the kind of discrepancy viewed in this study, where some information was removed, moved, or edited so that it no longer fulfilled the Report's requirements, and made it so that some institutions seemed to move

backwards between the Spring and the Fall.

There were other examples of institutional oversight in campus policies, as well. In Spring 2016, ten schools (36%) included at least one non-functional link in their policy, with one school having as many as 12 dysfunctional links. In Fall 2016, ten schools (36%) still had at least one malfunctioning link, with the greatest number of broken links being six. One school even included a link that re-directed to Utah State University's website. One school left an outdated policy available online that offered information about resources and offices on campus that had changed names or no longer existed and were contradicted by a second, more recent Title IX policy. Many policies did not use consistent language and had many typos and grammatical errors. Many schools used sexual violence, sexual assault, sexual harassment, and rape interchangeably, despite the distinct differences separating each of these offenses.

For recommendation three, communicating a culture of shared respect and responsibility, a surprising number of schools included vague statements about campus-wide campaigns in their policies that lacked specificity. Such statements in policy documents included phrasing such as: the "University provides comprehensive, intentional, and integrated...campaigns intended to end sexual assault" or "The University has developed an annual educational campaign consisting of presentations that include distribution of educational materials to new students; participating in and presenting information and materials during new employee orientation; and presentations, activities and other programming initiatives on an ongoing basis to employees and students."

Similar results were seen with policy descriptions of prevention, education and training programs. One school stated that the university is dedicated to "education and prevention programs that inform the community about the risks and myths that contribute to Title IX offenses." Another institution's only reference to training programs was in a bullet point, under

the responsibilities of the Title IX coordinator to “prepare and arrange for a preventative education program. Such programs will include information designed to encourage students to report incidents of sexual violence to the appropriate University and law enforcement authorities.”

All in all, many of these policies were incredibly difficult to find. Some policies were easily accessible from Google using keywords such as “Title IX” or “Sexual Misconduct,” but many others were embedded within the school’s Code of Student Conduct or Student Handbooks or were listed on webpages where each section of the policy was found through a different link. Furthermore, many schools did not have one central webpage or policy with all resources, procedures and information pertaining to sexual violence, but rather had separate webpages for Title IX, sexual violence education and prevention, student conduct, university police, human resources, and/or the University counseling center, making it difficult to discern where to go first.

A study conducted by researchers at the Ohio State University and Central Michigan University saw similar results, finding that colleges in Ohio are deficient in making their sexual assault policies accessible online, directly from search engines. These considerations should not be taken lightly, seeing as recent research has suggested that students are likely to turn to the Internet as a source of information for responding to sexual assault (Krivoshey et al., 2013).

Given this information, Ohio’s institutions should endeavor to make policies and procedures much more searchable from platforms such as Google or Yahoo and should maintain policies and resources in predictable and intuitive locations. Many policies migrated from one website to another between Spring and Fall, and while this researcher was under little time constraint to find the correct policy, survivors searching for information after an assault would

likely have a great deal of trouble navigating through webpages to find support resources and reporting information.

Although there were certainly many areas for improvement among the institutions scanned, it is equally as important to recognize exceptional policies at some of Ohio's colleges and universities. Cleveland State University's Sexual Violence Response Guide includes a section dedicated to men and sexual assault and reminds survivors that "the most important things to remember are that men can be sexually assaulted; men who have been sexually assaulted experience emotional reactions to their assault; men who have been assaulted are entitled to the same medical, legal and emotional support. **Men who have been sexually assaulted are never to be blamed for their assault** [emphasis original]." This section continues on to de-bunk rape myths surrounding men and sexual assault ("Sexual Violence Response Guide").

Kent State University's Sexual and Relationship Violence Support Services website included resources and information for the university's branch campuses, not just the main campus in Kent ("Regional Campus Resources"). With a total of 24 branch campuses from the 14 public universities across Ohio, a significant number of students at public universities study at branch campuses – about 52,732 students according to ODHE – but are often excluded by sexual misconduct and Title IX policies ("Ohio Public Institutions").

Miami University of Ohio had perhaps the most extensive and impressive policies of all schools scanned. In addition to having numerous education and training programs, Miami also has two student organizations dedicated to sexual violence prevention: Men Against Rape and Sexual Assault (MARS), and Women Against Violence and Sexual Assault (WAVES) ("MARS (Men Against Rape and Sexual Assault)"; "WAVES (Women Against Violence and Sexual

Assault’’). MARS is a male-only group whose main goal is to educate men about the issue of sexual violence and inform them of ways to prevent it. WAVES works to promote awareness and educate the Miami campus community through events, peer programming and victim support, and also provides safe spaces and resources to those personally affected by sexual and interpersonal violence.

Miami University also offers the free Just in Case App to students who are in need of guidance for how to approach friends in possibly dangerous situations and offers emergency information on resources in the area (‘‘Just In Case App’’).

The University of Akron is home to a campus- and community-wide Sexual Assault Resource Team (SART) founded in May 2014. SART releases an annual report with comprehensive information about awareness and prevention programs, the university’s partnership with the Akron-based Rape Crisis Center, and reports on the status of implementation of recommendations from the November 2014 SART report (‘‘Sexual Assault Resource Team (SART)’’).

Bowling Green State University posted a thirty-minute long sexual assault mock hearing on its website intended to educate the campus community on what a student conduct hearing encompasses and what the university consequences of sexual assault might be (‘‘Sexual Assault Awareness Mock Hearing’’). Similarly, Ashland University posted a script of a typical student conduct hearing on its website to give survivors an idea of what a hearing might entail (‘‘Student Conduct Hearing Board Agenda and Procedures’’).

Case Western Reserve University’s sexual misconduct policy includes a section describing the difference between intention and impact in sexual violence, another important distinction that is rare in university policies. This section explains that, ‘‘The fact that someone

did not intend to engage in sexual misconduct against an individual is not considered a sufficient explanation to a complaint of sexual misconduct...Although the respondent's perceptions will be considered, in most cases, it is the effect and characteristics of the behavior on the complainant, and whether a reasonable person in a similar situation would find the conduct offensive that determine whether the behavior constitutes sexual misconduct" ("Sexual Misconduct Policy").

Finally, the University of Dayton offers a unique program for professors who are unable to host class. Instead of cancelling, that professor may invite educators from the Sexual Violence Prevention Education Office to present a training program during class time. The university takes same-day reservations for these training programs and offers many different training options, including programs on the neurobiology of trauma, supporting survivors, rape culture, healthy relationships, bystander intervention, and many others ("Sexual Violence Prevention").

Limitations

The results of this study should be considered in light of several limitations. Institutional policies were downloaded for the first time in February 2016, about four months after the Report was released in October 2015. It's possible that institutions improved their policies before this researcher acquired them on February 1, thus limiting the benefits of the comparison between Spring and Fall compliance.

Furthermore, a policy scan is a somewhat subjective method. Two people might rate the same sentence differently, and this study utilized only one coder, with no other researchers to actively question assumptions. Despite this, concrete steps were taken to eliminate as much subjectivity in this analysis as possible. A codebook of clear compliance expectations was created, along with a numerical rating system with very distinct levels of compliance for each numerical score and an accompanying excel spreadsheet that guided the analysis on multiple

points. Additionally, Table 23 in Appendix B lists the exact search terms used when locating institutional policies through a search engine. With these steps having been taken, the study becomes more replicable and reliable. Having said this, institutional policies are ever changing, and even a replica of this study that is conducted one month after its conclusion could yield different policies, and thus different results.

Conclusion

By examining institutional policies at 14 public institutions and 14 private institutions in Ohio, it's clear that there is a need for substantial improvement in the incorporation of ODHE's recommendations into policies for higher education institutions in Ohio, as demonstrated by the low rates of compliance among Ohio's institutions. Although some institutions have demonstrated exceptional and innovative policies and programs, no institution in Ohio has fully complied with the recommendations set forth in ODHE's "Changing Campus Culture" Report. In fact, many Title IX and sexual misconduct policies considered in this scan included typos, outdated information, grammatical errors, and broken links. Many policies were not quickly or easily accessible, and a majority of the policies considered contained only a framework, with little concrete or specific information available.

While the sections of policy devoted to responding to sexual assaults on campus and detailing campus conduct procedures were significantly more robust and detailed, primary prevention and education fell by the wayside. Institutions should endeavor to develop policies that are, first and foremost, accessible, searchable and predictable. Students should be able to find them quickly, easily search for key words and phrases, and predict where phone numbers, emails, or other support information can be found, all in a short period of time. Sexual misconduct policies should also consider the needs of all students, including international

students, LGBTQ students, men, women, graduate students, undergraduates, commuter students, and branch campus students, all of whom may require different support services. Institutional policy must also be a comprehensive source of information for students, so that victims do not have to navigate through numerous sexual assault response websites before they access the information they need.

Institutions in Ohio are not on their own when improving policies, though. There are state and federal resources available to aid in the development of a more comprehensive institutional policy. For examples of model sexual violence policies, institutions can visit the U.S. Department of Justice's Office of Violence Against Women website on protecting students on college campuses. The Pennsylvania Coalition Against Rape also offers a resource where colleges can access their level of readiness for the primary prevention of sexual violence on campus, and then adopt strategies for prevention appropriate to their campus' readiness (Wasco & Zadnik, 2013).

In Ohio, the Ohio Alliance to End Sexual Violence and the Ohio Domestic Violence Network are two statewide coalitions that address sexual and intimate partner violence in Ohio and that have both received funding to advance efforts to create safer campus communities across the state. Although there is still much work to be done, there is a great deal of support behind college campuses to support sexual violence victims and improve prevention efforts, and together, Ohio can overcome this perplexing, destructive crime that afflicts our communities.

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Appendix A: “Changing Campus Culture” Policy Scan Codebook

Coding Key	
2	Addresses recommendation in full
1	Partially addresses recommendation
0	Does not address recommendation

Recommendation #1 – Using data to guide action

- a. Administer an **annual climate survey** to establish priorities and provide a tool to gauge success.
- b. Measure **effectiveness of all programs** aimed at reducing campus sexual violence.

Recommendation #2 – Empower staff, faculty, campus law enforcement and students to prevent and respond to sexual violence through evidence-based training

- a. Campuses should adopt and implement a comprehensive training program that **addresses multiple stakeholders** (such as staff, faculty, students, and law enforcement), and
- b. Uses **feedback gained from the campus climate survey** or other sources (such as focus groups, readiness assessment tools, etc.).

Supplemental Policy Analysis:

c. Bystander training:

- 1) Common components include raising awareness, building a sense of responsibility, discussing norms, weighing the pros and cons of speaking up, and building skills and confidence.
- 2) Trains students, staff and police to serve as **peer-educators** for others on campus

d. Self-protection:

- 1) Focuses on **assessing risk**, and
- 2) **self-defense**, and
- 3) **defining personal sexual boundaries**
- 4) Encompasses strategies students would feel comfortable employing in a variety of social contexts, i.e. if the perpetrator is known to the victim
- 5) Should not shift the onus of preventing sexual violence on potential victims, but instead **should be used to complement other efforts**

e. Trauma-Informed Training:

- 1) Trains campus responders, such as Title IX coordinators, investigators, and police
- 2) Ensures that these responders act in ways that **build survivor trust** and make it easier to document the criminal act that occurred (May be administered through an online module)

Recommendation #3 – Communicate a culture of shared respect and responsibility

- a. Campuses should implement a **widespread, cohesive awareness** and communication campaign in synergy with trainings and other initiatives to help shift campus culture.

Recommendation #4 – Develop a comprehensive response protocol

- a. Campuses should develop and implement a **comprehensive response protocol** that should:
 - 1) Work with their **survivor-centered strategies**, and
 - 2) Preserve the **rights of the accused**.

Supplemental Policy Analysis:

- b. Campus administrators should attempt to increase reporting through **ongoing outreach** to students and by making **reporting policies and procedures widely known** within the campus community.

Recommendation #5 – Adopt a survivor-centered response

- a. Campuses should adopt one or more response strategies centered on **survivors' needs** to strengthen student **trust in campus systems and processes**.

Supplemental Policy Analysis:

- b. **Confidential advisor:** a trained professional who can **provide support** to survivors while **safeguarding survivors** from engagement in subsequent investigative processes.
 - 1) May hold a mental health practitioner certification.
- c. **Victim advocate:**
 - 1) A trained professional who works **one on one with the survivor, and:**
 - 2) Offers victims **information, emotional support, 24/7 response at the hospital** during the evidence collection process, assistance with interim measures, help with finding resources, safety planning, assistance filing for victims of crime compensation, and more.
 - 3) Should be familiar with campus policies
 - 4) The most effective advocate should have the authority to request changes to a survivor's academic, living and campus work situations for the survivor
- d. **Sexual Assault Response Guarantee:**
 - 1) **Uses survivor-friendly terms**
 - 2) Explains what can be expected in the reporting process
 - 3) Typically attempts to **proactively alleviate many of the concerns** a survivor might have, such as where they will meet with the police and if/how their identity will be protected.

Appendix B: Additional Tables and Charts

Table 19: Selected educational institutions and titles of policies reviewed for campus sexual violence policies and procedures, Spring 2016

Institution Name	Policies Reviewed
Bowling Green State University	<ol style="list-style-type: none"> 1. Equal Opportunity and Diversity Policies 2. Code of Student Conduct
Central State University	<ol style="list-style-type: none"> 1. Policy No. 8: Discrimination, Harassment, Sexual Misconduct and Retaliation 2. Disciplinary Procedure for Discrimination, Harassment, Sexual Misconduct, and Retaliation Complaints Under Title IX
University of Cincinnati	<ol style="list-style-type: none"> 1. Policy 1.3.4 Policy Statement on Sex Offenses 2. Policy 11.03 Policy Statement on Sexual Harassment 3. Policy 11.02 Discriminatory Harassment 4. UC Title IX Grievance Procedure for Students and Third Parties
Cleveland State University	<ol style="list-style-type: none"> 1. Office for Institutional Equity Procedures for Addressing Reports of Discrimination and Harassment 2. Sexual Violence Response Protocol 3. Sexual Violence Response Guide (Linked through the Sexual Violence Response Protocol) 4. Policy 3344-2-03 Discrimination/Harassment Policy
Kent State University	<ol style="list-style-type: none"> 1. Code of Student Conduct 2. Policy 5-16.2 Administrative Policy Regarding Complaints of Unlawful Gender Discrimination, Gender/Sexual Harassment, Sexual Misconduct, Stalking, and Intimate Partner Violence
Miami University	<ol style="list-style-type: none"> 1. Title IX Protocol – Students 2. "Sexual Assault and Interpersonal Violence Prevention, Education, and Resources" (Linked through Campus Safety - Sexual Assault and Interpersonal Violence) 3. "Promises to Victims of Crimes" (Linked through Title IX Protocol – Students)
Northeast Ohio Medical University	<ol style="list-style-type: none"> 1. Student Handbook 2015-2016 2. Policy 3349-10-75 Sexual Misconduct and Harassment
Ohio University	<ol style="list-style-type: none"> 1. Sexual Misconduct, Relationship Violence and Stalking Process 2. Policy 03.004 Sexual Misconduct, Relationship Violence, and Stalking 3. Student Resources for Sexual Misconduct, Addendum to Policy 03.004 4. "Current Training Programs" (Linked through Policy 03.004)
Ohio State University	<ol style="list-style-type: none"> 1. Title IX Program Statement 2. Title IX Coordinator: Roles and Responsibilities 3. Policy 1.15 Sexual Misconduct, Sexual Harassment, and Relationship Violence
Shawnee State University	<ol style="list-style-type: none"> 1. Procedure 501-4R Sexual Harassment/Misconduct 2. Procedure 501-2R Reporting Complaints of Discrimination,

	Sexual Harassment/Misconduct & Retaliation
University of Toledo	<ol style="list-style-type: none"> 1. Policy 3364-61-02 Sexual Assault Response/Prevention 2. Policy 3364-50-01 UT Title IX 3. Policy 3364-25-65 Consensual Romantic and/or Sexual Relationships 4. "Sexual Assault Education and Prevention Program" (Linked through UT Title IX)
University of Akron	<ol style="list-style-type: none"> 1. Policy 3359-11-13 Sexual Harassment Policy 2. Policy 3359-41-01 Code of Student Conduct 3. Reporting Sexual Misconduct and Sexual Assault: Protocol for Sex-Based Offenses
Wright State University	<ol style="list-style-type: none"> 1. Student Sexual Misconduct Policy 2014-2015 2. Policy 4011 Gender-Based Harassment and Violence
Youngstown State University	<ol style="list-style-type: none"> 1. Sexual and Relationship Violence Policy 2. Policy 3356-2-03.1 Sexual Misconduct Policy
Ashland University	<ol style="list-style-type: none"> 1. Title IX Policy (Found in the Student Handbook) 2. Student Code of Conduct (Found in the Student Handbook)
Baldwin Wallace University	<ol style="list-style-type: none"> 1. Sexual Misconduct Policy 2. Student Handbook
Capital University	1. Policy 300 Sexual Misconduct
Case Western Reserve University	1. Sexual Misconduct Policy
Cedarville University	1. Title IX – Sexual Misconduct Policy
Franklin University	1. Policy to Address Discrimination, Harassment & Sexual Misconduct
John Carroll University	<ol style="list-style-type: none"> 1. Interpersonal Violence Policy 2. Community Standards Manual
Oberlin University	1. Sexual Misconduct Policy
Ohio Northern University	1. Sex Discrimination Policy
Tiffin University	1. Title IX Policies and Procedures
University of Dayton	<ol style="list-style-type: none"> 1. Student Handbook 2015-2016 2. Sexual Harassment/Misconduct Policy
University of Findlay	1. University Policy on Sexual Assault, Domestic Violence, Dating Violence and Stalking (SADVDVS)
University of Northwestern Ohio	1. Student Handbook 2015-2016
Xavier University	1. Student Handbook – Section 1.6 Sex Discrimination

Table 20: Selected educational institutions and titles of policies reviewed for campus sexual violence policies and procedures, Fall 2016

Institution	Policies Reviewed
Bowling Green State University	<ol style="list-style-type: none"> 1. Equal Opportunity and Diversity Policies 2. Code of Student Conduct
Central State University	<ol style="list-style-type: none"> 1. Policy No. 8 Discrimination, Harassment, Sexual Misconduct and Retaliation 2. Student Handbook 2015-2016
University of Cincinnati	<ol style="list-style-type: none"> 1. Policy 1.3.4 Statement on Sex Offenses 2. Policy 11.02 Discriminatory Harassment 3. Policy 11.03 Statement on Sexual Harassment
Cleveland State University	<ol style="list-style-type: none"> 1. 3344-2-03 Discrimination/Harassment Policy 2. Office for Institutional Equity Procedures for Addressing Reports of Discrimination and Harassment 3. Sexual Violence Response Guide 4. Sexual Violence Response Protocol
Kent State University	<ol style="list-style-type: none"> 1. Policy 5-16 University Policy Regarding Unlawful Discrimination and Harassment 2. Code of Student Conduct 3. Policy 5-16.2 Administrative Policy Regarding Complaints of Unlawful Gender Discrimination, Gender/Sexual Harassment, Sexual Misconduct, Stalking and Intimate Partner Violence
Miami University	<ol style="list-style-type: none"> 1. Title IX Protocol – Students 2. Resource Guide (Linked through Title IX Protocol – Students) 3. “Promises to Victims of Crimes” (Linked through Title IX Protocol – Students) 4. Sexual Assault and Interpersonal Violence, Prevention, Education and Resources (Linked through Title IX Protocol – Students)
Northeast Ohio Medical University	<ol style="list-style-type: none"> 1. Policy 3349-10-75 Sexual Misconduct and Harassment 2. Policy 3349-510 Code of Student Conduct
Ohio University	<ol style="list-style-type: none"> 1. Policy 03.004 Sexual Misconduct, Relationship Violence and Stalking 2. “Current Training Programs” (Linked through Policy 03.004) 3. Student Sexual Misconduct, Relationship Violence and Stalking Process
Ohio State University	<ol style="list-style-type: none"> 1. Title IX Coordinator: Statement of Roles and Responsibilities 2. Policy 1.15 Sexual Misconduct
Shawnee State University	<ol style="list-style-type: none"> 1. Procedure 501-2R Reporting Complaints of Discrimination, Sexual Harassment/Misconduct & Retaliation 2. Policy 501 Equal Opportunity & Non-Discrimination/Harassment Policy 3. Student Conduct Code
University of Toledo	<ol style="list-style-type: none"> 1. Policy 3364-50-01 UT Title IX 2. Policy 3364-25-65 Consensual Romantic and/or Sexual Relationships

	3. "Sexual Assault Education and Prevention Program" (Linked through UT Title IX)
University of Akron	1. Policy 3359-11-13 Sexual Harassment Policy 2. Policy 3359-41-01 Code of Student Conduct 3. Reporting Sexual Misconduct and Sexual Assault: Protocol for Sex-Based Offenses
Wright State University	1. Student Sexual Misconduct Policy 2. Gender-Based Harassment and Violence 4011
Youngstown State University	1. The Code of Student Rights, Responsibility and Conduct 2. Sexual and Relationship Violence Policy 3. Policy 3356-2-03.1 Sexual Misconduct Policy
Ashland University	1. Title IX Policy (Found in the Student Handbook) 2. Student Code of Conduct (Found in the Student Handbook)
Baldwin Wallace University	1. Sexual Misconduct Policy (Found in the Student Handbook)
Capital University	1. Policy 300 Sexual Misconduct
Case Western Reserve University	1. Sexual Misconduct Policy
Cedarville University	1. Title IX – Sexual Misconduct Policy
Franklin University	1. Policy to Address Discrimination, Harassment & Sexual Misconduct
John Carroll University	1. Interpersonal Violence Policy 2. Community Standards Manual
Oberlin University	1. Sexual Misconduct Policy
Ohio Northern University	1. Sex Discrimination Policy
Tiffin University	1. Civil Rights Equity Resolution Policy & Procedure (Found in the Student Handbook) 2. Student Code of Conduct (Found in the Student Handbook)
University of Dayton	1. Student Handbook 2016-2017 2. Sexual Harassment/Misconduct Policy
University of Findlay	1. University Policy on Sexual Assault, Domestic Violence, Dating Violence and Stalking (SADVDVS)
University of Northwestern Ohio	1. Student Code of Conduct (Found in the Student Handbook)
Xavier University	1. Student Handbook – Section 1.6 Sex Discrimination 2. Gender-Based & Sexual Misconduct Reporting and Support Options for Students (Linked through the Student Handbook)

Table 21: Characteristics of Public Institutions Scanned¹

Table 21: Public Institutions	Total Undergrad Enrollment	Percent Female	Percent Male	Percent of Undergrads Age 24 and Under	Percent Full-time Students	In-State Tuition & Fees 2015-2016	Avg. Amt. of Grant or Scholarship Financial Aid Received	No. Reported Sex Offenses on Campus - 2014
Bowling Green State University	14,334	57%	43%	94%	92%	\$10,796	\$6,890	11
Central State University	1,792	55%	45%	88%	92%	\$6,246	\$6,770	0
University of Cincinnati	25,009	50%	50%	85%	84%	\$11,000	\$6,876	10
Cleveland State University	12,101	53%	47%	73%	75%	\$9,696	\$6,486	4
Kent State University	23,607	60%	40%	87%	81%	\$10,012	\$7,132	13
Miami University	16,387	51%	49%	98%	98%	\$14,287	\$9,805	14
Northeast Ohio Medical University	922 (All Graduate)	50%	50%	N/A	99%	\$9,288	N/A	0
Ohio State University	45,289	48%	52%	92%	91%	\$10,037	\$9,228	33
Ohio University	23,513	59%	41%	75%	74%	\$11,548	\$5,483	20
Shawnee State University	3,729	56%	44%	82%	83%	\$7,364	\$4,974	3
University of Toledo	16,064	48%	52%	85%	79%	\$9,547	\$8,301	1
University of Akron	19,093	47%	53%	84%	80%	\$10,509	\$6,388	6
Wright State University	12,722	52%	48%	80%	78%	\$8,730	\$6,365	12
Youngstown University	11,130	52%	48%	79%	77%	\$8,317	\$7,254	1

¹ Data retrieved from: "College Navigator." (n.d.). U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics.

Table 22: Characteristics of Private Institutions Scanned²

Table 22: Private Institutions	Total Undergrad Enrollment	Percent Female	Percent Male	Percent of Undergrads Age 24 and Under	Percent Full-time Students	In-State Tuition & Fees 2015-2016	Avg. Amt. of Grant or Scholarship Financial Aid Received	No. Reported Sex Offenses on Campus - 2014
Ashland University	3,716	53%	47%	69%	70%	\$20,242	\$10,108	2
Baldwin Wallace University	3,369	55%	45%	89%	90%	\$29,908	\$19,250	3
Capital University	2,765	58%	42%	87%	91%	\$32,830	\$22,098	4
Case Western Reserve University	5,121	45%	55%	98%	98%	\$44,560	\$28,138	14
Cedarville University	3,353	52%	48%	99%	90%	\$27,206	\$12,594	0
Franklin University	4,121	56%	44%	14%	68%	\$11,641	\$6,009	0
John Carroll University	3,153	49%	51%	98%	95%	\$37,180	\$23,774	5
Oberlin University	2,912	56%	44%	100%	99%	\$50,582	\$23,846	12
Ohio Northern University	2,401	45%	55%	97%	89%	\$28,810	\$19,325	2
Tiffin University	2,441	52%	48%	69%	74%	\$22,165	\$13,834	1
University of Dayton	8,665	47%	53%	97%	95%	\$39,090	\$20,068	8
University of Findlay	3,713	62%	38%	90%	73%	\$31,508	\$18,723	4
University of Northwestern Ohio	3,906	20%	80%	88%	90%	\$9,930	\$6,165	1
Xavier University	4,548	54%	46%	94%	93%	\$35,080	\$20,389	9

² Data retrieved from: "College Navigator." (n.d.). U.S. Department of Education, Institute of Education Sciences, National Center for Education Statistics. Retrieved from <http://nces.ed.gov/collegenavigator/>

Table 23: Search Terms Used

Primary Search Terms	“(Institution Name)” AND “Sexual Misconduct” OR “Sexual Assault”
Secondary Search Terms	“(Institution Name)” AND “Title IX”
Tertiary Search Terms	“(Institution Name)” AND “Sexual Violence”
Quaternary Search Terms	“(Institution Name)” AND “Policy” AND “Sexual”

Appendix C: Sample page from documentation Excel workbook

Rating Key		Component Rating	Objective Rating	Reasoning for Rating (What is lacking?)	Page Number/Policy Document
2	Addresses recommendation in full				
1	Partially addresses recommendation				
0	Does not address recommendation				
Recommendation 1: Using data to guide action		1			
	1a. Annual climate survey		2	"Title IX coordinator is in charge of coordinating the development and implementation of annual assessments of campus climate"	Policy #2, Page 8
	1b. Measure effectiveness of all programs		1	Policy references "evidence-based training" offered by the sexual violence education program, as well as evaluations of workshops, but it does not state that every program is evaluated	Policy #2, Page 5
Recommendation 2: Evidence-based training		1			
	2a. Training program addresses multiple stakeholders		2	Title IX coordinator partners with local sexual violence survivor support and education agencies to provide additional resources to campus. Community representatives are included on the campus sexual violence committee and are involved in campus events and strategic planning. Community reps also receive training on campus processes and resources. Partners with local law enforcement to ensure victims get needed resources and support those who are victimized off-campus. Also partners with Sexual Assault Nurse Examiners at local hospitals to support victims who seek medical treatment. Title IX also partners with several offices across campus	Policy #2, Page 3-4
	2b. Program uses feedback gained from climate survey		1	Sexual violence education program provides evidence-based primary prevention efforts, and evaluates workshops that incorporate primary prevention methods and aim to increase knowledge about sexual violence. Does not mention using feedback from the climate survey, but these evaluations would count towards "other sources," as mentioned in the Report	Policy #2, Page 5
Recommendation 3: Culture of shared respect and responsibility		1			
	3a. Widespread, cohesive awareness campaign		1	Policy notes that the educational team provides awareness campaigns, but the names or functions of these campaigns are not mentioned, though it is clear that the awareness campaigns, whatever they are, are provided in synergy with other awareness programs also provided by the team.	Policy #2, Page 5
Recommendation 4: Develop a comprehensive response protocol		2			
	4a. Comprehensive response protocol		2	4a(1) The University does have a comprehensive sexual misconduct policy that is survivor-centered. The rights of the complainant throughout the process are clearly outlined throughout the Policy, there are prohibitions on any form of retaliation for reporting an incident, and numerous resources to aid victims are listed on the final page of the Policy. 4a(2) Multiple statements concerning rights of accused: "the university will consider the rights and concerns of all parties and provide an equitable process" "when making decision affecting an individual's employment or academic status, allegations of sexual misconduct may be considered only if they have been addressed through this policy or procedure" "parties may have a support person of their choice present." The policy also states that "a student charged with one or more violations of the Code of Student Conduct has the right to a hearing" and that "the accused will be informed in writing of the finding and any recommendation for sanctions or corrective action."	Policy #3
Recommendation 5: Adopt a survivor-centered response		2			
	5a. Response strategies centered on survivors' needs		2	The institution has a Sexual Assault Response Guarantee and victim advocates.	Policy #1, page 2 & 5; Policy #2, page 3